

# HONOLULU GENERATING STATION

HID000150680 HI  
Part A X-1

## DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION RCRA Corrective Action Environmental Indicator (EI) RCRIS code (CA725)

### Current Human Exposures Under Control

Facility Name: Honolulu Generating Station  
Facility Address: 170 Ala Moana Generating Station, Honolulu, Hawaii  
Facility EPA ID #: HID000150680

1. Has **all** available relevant/significant information on known and reasonably suspected releases to soil, groundwater, surface water/sediments, and air, subject to RCRA Corrective Action (e.g., from Solid Waste Management Units (SWMU), Regulated Units (RU), and Areas of Concern (AOC)), been **considered** in this EI determination?

X If yes - check here and continue with #2 below.

       If no - re-evaluate existing data, or

       If data are not available skip to #6 and enter "IN" (more information needed) status code.

### BACKGROUND

#### Definition of Environmental Indicators (for the RCRA Corrective Action)

Environmental Indicators (EI) are measures being used by the RCRA Corrective Action program to go beyond programmatic activity measures (e.g., reports received and approved, etc.) to track changes in the quality of the environment. The two EI developed to-date indicate the quality of the environment in relation to current human exposures to contamination and the migration of contaminated groundwater. An EI for non-human (ecological) receptors is intended to be developed in the future.

#### Definition of "Current Human Exposures Under Control" EI

A positive "Current Human Exposures Under Control" EI determination ("YE" status code) indicates that there are no "unacceptable" human exposures to "contamination" (i.e., contaminants in concentrations in excess of appropriate risk-based levels) that can be reasonably expected under current land- and groundwater-use conditions (for all "contamination" subject to RCRA corrective action at or from the identified facility (i.e., site-wide)).

#### Relationship of EI to Final Remedies

While Final remedies remain the long-term objective of the RCRA Corrective Action program the EI are near-term objectives which are currently being used as Program measures for the Government Performance and Results Act of 1993, GPRA). The "Current Human Exposures Under Control" EI are for reasonably expected human exposures under current land- and groundwater-use conditions ONLY, and do not consider potential future land- or groundwater-use conditions or ecological receptors. The RCRA Corrective Action program's overall mission to protect human health and the environment requires that Final remedies address these issues (i.e., potential future human exposure scenarios, future land and groundwater uses, and ecological receptors).

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**Duration / Applicability of EI Determinations**

EI Determinations status codes should remain in RCRIS national database ONLY as long as they remain true (i.e., RCRIS status codes must be changed when the regulatory authorities become aware of contrary information).

2. Are groundwater, soil, surface water, sediments, or air **media** known or reasonably suspected to be **"contaminated"**<sup>1</sup> above appropriately protective risk-based "levels" (applicable promulgated standards, as well as other appropriate standards, guidelines, guidance, or criteria) from releases subject to RCRA Corrective Action (from SWMUs, RUs or AOCs)?

	<u>Yes</u>	<u>No</u>	<u>?</u>	<u>Rationale / Key Contaminants</u>
Groundwater		X		
Air (indoors) <sup>2</sup>		X		
Surface Soil (e.g., <2 ft)		X		
Surface Water		X		
Sediment		X		
Subsurf. Soil (e.g., >2 ft)		X		
Air (outdoors)		X		

X If no (for all media) - skip to #6, and enter "YE," status code after providing or citing appropriate "levels," and referencing sufficient supporting documentation demonstrating that these "levels" are not exceeded.

       If yes (for any media) - continue after identifying key contaminants in each "contaminated" medium, citing appropriate "levels" (or provide an explanation for the determination that the medium could pose an unacceptable risk), and referencing supporting documentation.

       If unknown (for any media) - skip to #6 and enter "IN" status code.

**Rationale:**

<sup>1</sup> "Contamination" and "contaminated" describes media containing contaminants (in any form, NAPL and/or dissolved, vapors, or solids, that are subject to RCRA) in concentrations in excess of appropriately protective risk-based "levels" (for the media, that identify risks within the acceptable risk range).

<sup>2</sup> Recent evidence (from the Colorado Dept. of Public Health and Environment, and others) suggests that unacceptable indoor air concentrations are more common in structures above groundwater with volatile contaminants than previously believed. This is a rapidly developing field and reviewers are encouraged to look to the latest guidance for the appropriate methods and scale of demonstration necessary to be reasonably certain that indoor air (in structures located above (and adjacent to) groundwater with volatile contaminants) does not present unacceptable risks.

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*The Hawaiian Electric Company, Inc.'s (HECO) Honolulu Generating Station is an active steam/electric generating plant. It occupies 3.4 acres on the eastern side of Honolulu Harbor on the south side of the island of Oahu. There are two generating units in operation at the facility, each consisting of a boiler, turbine, generator, and condenser.*

*Waste streams generated at the facility include demineralizer regeneration wastes, condenser and boiler tube cleaning wastes, boiler fireside and air heater wash water, and low-volume wastes consisting of boiler blow down and water from building floor drains. Prior to 1986, potentially hazardous wastes at this facility were discharged to three concrete sumps on the site. Since then, the wastes generated and the treatment processes at the station have not changed, only the waste treatment facilities have changed.*

*In 1986, the sumps underwent closure in accordance with RCRA guidelines (EPA Certification of Closure letter from Jeff Zelikson to Dr. Brenner Munger dated June 23 1987). The wastewater treatment system currently in operation at the Honolulu generating station is a "totally enclosed treatment system" as defined by 40 CFR 260.10(26). A totally enclosed treatment facility is one that is directly connected to an industrial production process and is constructed and operated in a manner which prevents the release of hazardous waste of constituents into the environment.*

*Other than the former regulated units no Solid Waste Management Units have been identified for this facility per the USEPA "Preliminary Assessment Review" dated 10/15/1991.*

*The above reference "Preliminary Assessment Review" concluded:*

- *There was no apparent release of hazardous substances to the environment from the sumps prior to closure in 1987;*
- *There is little likelihood of a release of hazardous substances to the environment from the current system due to adequate containment features; and*
- *Only a small quantity of hazardous waste is generated at this facility.*

*Confirming this conclusion, a March 18, 2003 hazardous waste inspection by the USEPA Region 9 at the HECO facility found no instances of a release.*

References

Environmental Priorities Initiative Preliminary Assessment, Ecology and Environment, Inc. April 30 1990

USEPA Preliminary Assessment Review, 10/15/1991

USEPA HECO inspection report dated May 15, 2003

3. Are there **complete pathways** between "contamination" and human receptors such that exposures can be reasonably expected under the current (land- and groundwater-use) conditions?

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Summary Exposure Pathway Evaluation Table  
Potential **Human Receptors** (Under Current Conditions)

<b><u>"Contaminated" Media</u></b>	<b>Residents</b>	<b>Workers</b>	<b>Day-Care</b>	<b>Construction</b>	<b>Trespassers</b>	<b>Recreation</b>	<b>Food<sup>3</sup></b>
Groundwater							
Air (indoors)							
Soil (surface, e.g., <2 ft)							
Surface Water							
Sediment							
Soil (subsurface e.g., >2 ft)							
Air (outdoors)							

Instructions for Summary Exposure Pathway Evaluation Table:

1. Strike-out specific Media including Human Receptors' spaces for Media which are not "contaminated" as identified in #2 above.
2. enter "yes" or "no" for potential "completeness" under each "Contaminated" Media -- Human Receptor combination (Pathway).

Note: In order to focus the evaluation to the most probable combinations some potential "Contaminated" Media - Human Receptor combinations (Pathways) do not have check spaces ("\_\_\_"). While these combinations may not be probable in most situations they may be possible in some settings and should be added as necessary.

\_\_\_\_ If no (pathways are not complete for any contaminated media-receptor combination) - skip to #6, and enter "YE" status code, after explaining and/or referencing condition(s) in-place, whether natural or man-made, preventing a complete exposure pathway from each contaminated medium (e.g., use optional Pathway Evaluation Work Sheet to analyze major pathways).

\_\_\_\_ If yes (pathways are complete for any "Contaminated" Media - Human Receptor combination) - continue after providing supporting explanation.

\_\_\_\_ If unknown (for any "Contaminated" Media - Human Receptor combination) - skip to #6 and enter "IN" status code.

Rationale:

Reference

<sup>3</sup> Indirect Pathway/Receptor (e.g., vegetables, fruits, crops, meat and dairy products, fish, shellfish, etc.)

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4. Can the **exposures** from any of the complete pathways identified in #3 be reasonably expected to be **“significant”**<sup>4</sup> (i.e., potentially “unacceptable” because exposures can be reasonably expected to be: 1) greater in magnitude (intensity, frequency and/or duration) than assumed in the derivation of the acceptable “levels” (used to identify the “contamination”); or 2) the combination of exposure magnitude (perhaps even though low) and contaminant concentrations (which may be substantially above the acceptable “levels”) could result in greater than acceptable risks)?

----- If no (exposures can not be reasonably expected to be significant (i.e., potentially “unacceptable”) for any complete exposure pathway) - skip to #6 and enter “YE” status code after explaining and/or referencing documentation justifying why the exposures (from each of the complete pathways) to “contamination” (identified in #3) are not expected to be “significant.”

----- If yes (exposures could be reasonably expected to be “significant” (i.e., potentially “unacceptable”) for any complete exposure pathway) - continue after providing a description (of each potentially “unacceptable” exposure pathway) and explaining and/or referencing documentation justifying why the exposures (from each of the remaining complete pathways) to “contamination” (identified in #3) are not expected to be “significant.”

----- If unknown (for any complete pathway) - skip to #6 and enter “IN” status code

Rationale:

References

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<sup>4</sup> If there is any question on whether the identified exposures are “significant” (i.e., potentially “unacceptable”) consult a human health Risk Assessment specialist with appropriate education, training and experience.

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5. Can the "significant" **exposures** (identified in #4) be shown to be within **acceptable** limits?

\_\_\_\_\_ If yes (all "significant" exposures have been shown to be within acceptable limits) - continue and enter "YE" after summarizing and referencing documentation justifying why all "significant" exposures to "contamination" are within acceptable limits (e.g., a site-specific Human Health Risk Assessment).

\_\_\_\_\_ If no (there are current exposures that can be reasonably expected to be "unacceptable")- continue and enter "NO" status code after providing a description of each potentially "unacceptable" exposure.

\_\_\_\_\_ If unknown (for any potentially "unacceptable" exposure) - continue and enter "IN" status code

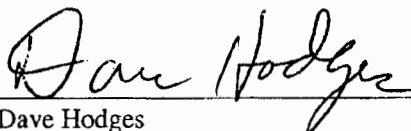
Rationale:

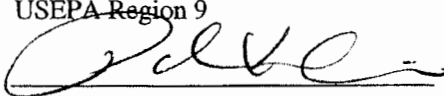
References

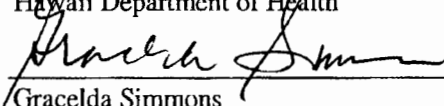
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6. Check the appropriate RCRIS status codes for the Current Human Exposures Under Control EI event code (CA725), and obtain Supervisor (or appropriate Manager) signature and date on the EI determination below (and attach appropriate supporting documentation as well as a map of the facility):

x	YE - Yes, "Current Human Exposures Under Control" has been verified. Based on a review of the information contained in this EI Determination, "Current Human Exposures" are expected to be "Under Control" at the <b>Honolulu Generating Station facility, EPA ID # HID000150680, located at 170 Ala Moana Boulevard, Honolulu, Hawaii</b> under current and reasonably expected conditions. This determination will be re-evaluated when the Agency/State becomes aware of significant changes at the facility.
	NO - "Current Human Exposures" are NOT "Under Control."
	IN - More information is needed to make a determination.

Completed by:  Date: 03-22-2010  
Dave Hodges  
Environmental Scientist  
USEPA Region 9

Completed by:  Date: 5/29/2010  
Paul Kalaiwaa  
Environmental Health Specialist  
Hawaii Department of Health

Supervisor:  Date: 3/30/2010  
Gracelda Simmons  
Supervisor, Hazardous Waste Section  
Hawaii Department of Health

Locations where References may be found: <i>USEPA Region 9 75 Hawthorne Street San Francisco, CA 94105 or Hawaii Department of Health 919 Ala Moana Blvd., Room 212 Honolulu, Hawaii 96814</i>
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Contact telephone and e-mail numbers

(name)	Paul Kalaiwaa
(phone #)	808-586-4237
(e-mail)	Kalaiwaa.paul@doh.hawaii.gov

**FINAL NOTE: THE HUMAN EXPOSURES EI IS A QUALITATIVE SCREENING OF EXPOSURES AND THE DETERMINATIONS WITHIN THIS DOCUMENT SHOULD NOT BE USED AS THE SOLE BASIS FOR RESTRICTING THE SCOPE OF MORE DETAILED (E.G., SITE-SPECIFIC) ASSESSMENTS OF RISK.**